

We Avoid and Report Conflicts of Interest

Acting ethically means using good business judgment to act in Revlon's best interest. A "conflict of interest" may cloud your business judgment or impact your ability to make objective and effective business decisions in Revlon's best interest. Some areas where conflicts of interest may arise are discussed further below, and Frequently Asked Questions regarding conflicts of interest are available on oneinbeauty.com.

Personal Investments. Unless you obtain approval from Revlon Compliance, you are prohibited from having either a direct or indirect ownership or other interest in any competitor, supplier of goods or services, or customer of Revlon.

Close Personal Relationships. A conflict of interest can arise from close personal relationships between employees, employees and temporary workers, employees and business partners (including independent contractors or suppliers), or employees and competitors. Close personal relationships can arise from, among other things, familial connections, romantic relationships, external preexisting business relationships or networks, or individuals living in your household. You must disclose any such relationships to your manager, Human Resources, or Revlon Compliance.

Workplace relationships between employees could negatively impact job performance, impede the ability to supervise others, disrupt the work environment, create the impression of favoritism, or make other employees feel uncomfortable. As mentioned above, romantic relationships in the workplace should be disclosed to Revlon Compliance and at no time may any manager supervise an employee with whom they have a romantic relationship.

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Outside Employment and Other Activities. Unless you obtain written pre-approval from Revlon Compliance, you may not serve as a paid or unpaid consultant to, or as a director, officer, board member, employee, partner, agent, or representative of, any organization, especially an organization that is an actual or potential competitor, supplier of goods or services or customer of Revlon. Such relationships can create the appearance of divided loyalty and collaborating with a competitor, supplier or customer creates the risk that the employee may inadvertently disclose proprietary information to such organization or allow such organization to benefit from the employee's association with the Company.

If you are approved to engage in outside employment or activities:

- It should not be so demanding on your time or attention that it interferes with your job performance or performance of services. You cannot use Revlon property and/or products (whether purchased or provided at no cost) in connection with your outside employment or business activities or use your position at Revlon to benefit your outside employment or business activity in any other way.
- If you receive public attention (e.g., media coverage, public recognition) for work performed in connection with outside employment or outside volunteer activity, notify your supervisor or Revlon Compliance.

If you believe you have an actual or potential conflict of interest **at any time during the course of your employment with or service to Revlon**, you are required to promptly disclose it by completing a **Conflicts of Interest Questionnaire**, which is available on the Compliance page on **oneinbeauty.com**. Revlon Compliance will review each disclosure and determine next steps. Please do not take any action regarding your request until you have received a determination from Revlon Compliance.

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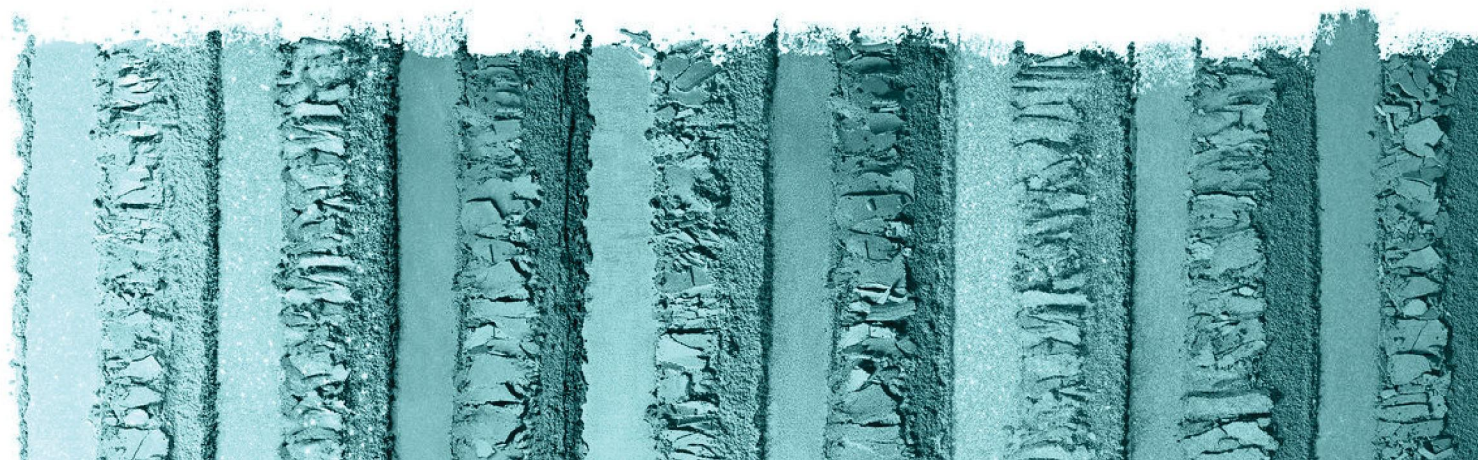


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WE ACT WITH FINANCIAL INTEGRITY

We Comply with U.S. Securities and Insider Trading Laws

All Revlon People worldwide must comply with U.S. securities laws, which prohibit trading securities using material non-public information, commonly referred to as insider trading.

In the course of your employment with or service to Revlon, you may become aware of material non-public information regarding the Company or other firms it does business with. You cannot buy, sell, or otherwise trade securities when in possession of material non-public information or disclose such information to another person.

Examples of “material” information include, but are not limited to:

- Financial results or forecasts
- Dividends
- Possible mergers, acquisitions, joint ventures
- Obtaining or losing important contracts
- Important product developments
- Major litigation developments
- Major changes in business strategy

Information is only considered “public” when official announcements of information have been adequately disclosed so that the public has had the time and opportunity to evaluate the information.

Examples of adequate disclosure include public filings with securities regulatory authorities (such as Annual Reports on Form 10-K, Quarterly Reports on Form 10-Q and Current Reports on Form 8-K filed with or furnished to the SEC), issuance of Company press releases and may also include Company meetings with members of the press and the public.

If you have a question about confidential information and/or securities trading, please refer to the Company’s **Confidentiality of Information and Securities Trading Policy** and/or contact Revlon Legal before taking any action.

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We Maintain Accurate Books and Records and Appropriately Retain Company Records

Accurate and timely recording and reporting of information is critical to our ability to make responsible business decisions. Our financial statements, including the books and records on which they are based, and all operating records must fully, fairly and accurately reflect all corporate transactions. These records must conform to all legal and accounting requirements, and internal accounting policies, procedures, and controls for all Company operations, including financial reporting.

Revlon People should not:

- Knowingly provide false, misleading, or inaccurate Company information
- Fraudulently or improperly influence, coerce, manipulate, or mislead any independent public or certified accountant engaged in the performance of an audit of the Company's financial statements for the purpose of rendering such financial statements materially misleading
- Take any action that could be reasonably expected, if successful, to result in rendering such financial statements materially misleading

Likewise, we must comply with all laws relating to records preservation which require that certain documents and communications be retained for varying periods. For more information, please see our **Global Records Retention Policy**.

If you become aware that there is potential or pending litigation, government investigation or subpoena, you must immediately contact Revlon Legal and retain any related documents and communications. If Revlon Legal has issued a Hold Order, you should retain all related materials until the Hold Order has been lifted by Revlon Legal. If you have any doubt as to whether any materials should be retained, you should consult with Revlon Legal and retain the materials unless advised otherwise.

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We Protect Company Confidential and Proprietary Information

Revlon People may have access to the Company's confidential and proprietary information, including intellectual property (defined below), which is commercially sensitive and valuable. Revlon People may not improperly disclose or use any confidential or proprietary information learned as a result of their relationship with the Company to benefit themselves or others, even after their relationship with Revlon ends. Similarly, Revlon People are also prohibited from improperly using commercially sensitive, confidential, or proprietary information obtained from former employers or other third parties.

We Protect Company Intellectual Property

Various laws govern the use of material and/or information which may be the subject of a trademark, patent, or copyright or which may be treated as a trade secret. The Company owns (and/or uses under a license) numerous trademarks, patents, copyrights, and trade secrets ("intellectual property") that are vital to its success. To protect the Company's rights, employee use of all intellectual property owned by the Company and by third parties must be in accordance with all applicable laws and our policies, including the **Global Trademark, Copyright, and Domain Name Policy**. In addition, Revlon People are prohibited from infringing on the legal rights of third parties with respect to intellectual property owned by them.

Contact Revlon Legal if you have questions about any of the following:

- Trademark, copyright, or right-of-publicity laws
- The Global Trademark, Copyright, and Domain Name Policy
- Trade secrets or patent laws, including the patentability of a formula, packaging, product, or idea
- An unsolicited submission from a third party, including a proposal for new products, packaging, marketing ideas or business ideas (see also our **Unsolicited Submissions Policy**)

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We Protect Company Assets and Use Information Technology (IT) Resources Appropriately



Revlon People are responsible for protecting the Company's assets, including Revlon's IT network (including but not limited to e-mail, instant messaging, and the internet) and any Company equipment and devices. Revlon People should use such assets and resources only for appropriate business purposes and in a professional, ethical, respectful and lawful manner, as described in the Company's IT policies. Employees must also report theft or misuse of Company property or resources to Revlon Security at security@revlon.com.

Infrequent use of Revlon's IT network and Company devices for personal reasons is acceptable, provided it does not interfere with business activities, it complies with all IT Security protocols/best practices and is not used for activities that are unlawful, unprofessional, unethical, disrespectful or is otherwise contrary to this Code or other Company policies.

Revlon People do not have any right of privacy when using Revlon's IT resources, including Revlon's IT network and Company devices.

Revlon owns the Revlon IT network and all information that is stored or processed on that network including, but not limited to, documents, electronic messages, spreadsheets, ideas, inventions, processes, designs, concepts, formulas, algorithms, data, programs, applications, documentation, studies, tests, literary work, audiovisual work and any other work of authorship or other information created, sent, received, deleted, stored, or otherwise associated in any way with the Company's business.

Revlon may access, monitor, review, intercept, quarantine, copy, delete, or disclose any information stored on or transmitted through the network, including but not limited to software, electronically stored documents, e-mail, telephone messages, instant messages, text or SMS messages, other electronic messages, internet access, and communications and information captured, stored, or synced to any cloud using Revlon-issued mobile devices, subject to local laws and regulations. Revlon People may be required to provide their Revlon-issued mobile devices or any personal device that may be determined to contain Company information in connection with any Revlon Legal or investigative matter, subject to applicable laws.

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Please contact IT and/or IT Security with any questions about this section of the Code and/or IT policies.

We Comply with Data Privacy and Protection Laws

Revlon respects the privacy rights of its employees and those with whom we conduct business, such as our consumers and customers. We monitor evolving data privacy and protection laws and handle personal data responsibly and in compliance with these laws. In general, personal data, also referred to as personally identifiable information ("PII"), refers to information that identifies or relates to an individual person, such as name, email address, physical address, telephone number, date of birth, health information and payment information.

As part of your employment, you may provide certain personal data to the Company, such as email and physical address and family information, which you agree that the Company may use for the administration of the employment relationship, including for benefits. Similarly, consumers, customers, suppliers and other third parties – in the course of their business relationships with Revlon – may provide personal data, such as names, telephone numbers, physical addresses, e-mail addresses and credit card information, to the Company.

If you are authorized to access personal data in the performance of your job, you may only access, collect, use, or share such data to the extent necessary and relevant to fulfill your assigned job responsibilities and in accordance with Revlon policies and applicable laws and regulations. Consumer data uses are governed by the Company's privacy notices on our consumer-facing websites.

Revlon People are expected to comply with the following data privacy principles:

- Provide adequate notice prior to collecting personal data
- Obtain consents to use personal data, where required by applicable law
- Only collect, process, use and retain personal data for the reason it was provided to Revlon, unless we have another lawful basis for other uses, and as necessary for the Company's recordkeeping purposes
- Keep personal information accurate, complete, and up-to-date
- Take reasonable steps to safeguard personal data to prevent unauthorized access, disclosure, or use
- Comply with all applicable data privacy laws

Revlon People should also practice good **cybersecurity hygiene**, as we all play a critical role in helping to prevent, detect and respond quickly to cyber threats. If you suspect any loss, theft, or unauthorized access, use or disclosure of personal or sensitive information, please contact Revlon Compliance, IT Security or Revlon Legal immediately.

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We Keep Company Communications Professional

Revlon People should exercise professionalism in all communications and consider the purpose and context when creating documents or communicating on behalf of the Company. All documents and communications created by Revlon People in connection with Revlon's business – whether they reside on the Revlon network or elsewhere – are considered corporate records that may be subject to production and review under applicable laws. All written or recorded communications should be professional, as concise and clear as possible, and avoid sarcasm or other language that could be misinterpreted when taken out of context.

We Protect Privacy of Communications

Revlon People are required to comply with all laws governing wiretapping and other forms of electronic surveillance as well as the use of these recordings. Generally, employees are prohibited from making any sound, photographic or video recordings, and using or disclosing such recordings in any manner (e.g., social media, electronic messages, e-mail, facsimile, or regular mail).

Recording an internal training session for Revlon People to make it available to team members who could not attend is permissible, as long as all participants consent before the recording begins. Such recordings are owned by Revlon and must not be shared externally. In addition, these recordings must be maintained according to Revlon's **Global Records Retention Policy**.



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We Use Social Media Responsibly

Revlon People are expected to use good judgment and common sense when using social media professionally and personally. Revlon People are required to use social media in a manner that is consistent with our Company's values and complies with all applicable laws.

If you use social media in connection with your role at Revlon, you are required to follow the Company's **Social Media Policy**. The Social Media Policy also provides guidance on the personal use of social media referencing Revlon.

The following behavior is prohibited, particularly when using social media and other online postings:

- Disclosing confidential, proprietary and/or sensitive information owned by the Company or any of its employees, subsidiaries, or affiliates
- Disparaging the Company, its employees, its products, or any of its competitors
- Posting inappropriate pictures, documents, emails, electronic messages or any recordings from the workplace or of Revlon People
- Unauthorized sale of Company products
- Engaging in any behavior that is unprofessional, unethical, disrespectful, illegal, or violates this Code and/or applicable law

We Follow Company Procedures when Responding to Inquiries from the Press and Others

To ensure that our communication with external parties is accurate and consistent with applicable laws, we limit the individuals who may communicate with the press, news media, investors, analysts, governmental bodies, and others as follows:

- Requests from the media, including requests for quotes, interviews of any Revlon People, press releases, financial or business information, etc., must be immediately referred to the CEO's Chief of Staff
- Requests from any government or regulatory body (U.S. or non- U.S.), including subpoenas and requests for information, must be immediately referred to Revlon Legal and/or Revlon Compliance before any action is taken

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